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Attorneys for Jose Mata and Karen Mata.

UNITED STATES BANKRUPTCY COURT
 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

In re
 PG&E Corporation,
 and
 PACIFIC GAS AND ELECTRIC
 COMPANY,
 Debtors.

☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

*All papers shall be filed in the Lead Case,
 No. 19-30088-DM,

Case No. 19-30088-DM

Chapter 11
 Lead Case, Jointly Administered

**MOTION PURSUANT TO FED. R.
 BANKR. PROC. 7015 FOR AN ORDER
 DEEMING AMENDED CLAIM TO
 RELATE BACK/OR PURSUANT TO FED.
 R. BANKR. P. 9006(b)(1) TO ENLARGE
 THE TIME FOR JOSE AND KAREN
 MATA TO FILE PROOF OF CLAIM**

Date: August 4, 2020
 Time: 10:00 a.m.
 Crtrm.: Courtroom 17
 450 Golden Gate Avenue
 San Francisco, CA 94102
 Judge: Hon. Dennis Montali

Objection deadline: July 28, 2020
 4:00 p.m. (Pacific Time)

Pursuant to Rule 7015 of the Federal Rules of Bankruptcy Procedure, Jose Mata and Karen Mata (“the Matas” or “Movants”) seek an order deeming their Amended Proof Claim to relate back to their timely proof of claim; alternatively, Movants seek an order expanding the time for them to file their Amended Proof of Claim in these cases. The Matas (through counsel) filed their original claims with Prime Clerk on October 17, 2019. A copy of these claims (Claim Nos. 32214-32215) are attached hereto as Exhibits 1 and 2. They filed their amended claims (Claim

Nos. 97052, 97055) on February 26, 2020, which are attached hereto as Exhibits 3 and 4. This Motion is based upon the points and authorities set forth herein and the concurrently filed Notice of Hearing and Declaration of Richard Frankel ("Frankel Decl.") in support of the Motion, in addition to any evidence or oral argument presented at the time of any hearing on this matter. In support thereof, the Matas, by and through their undersigned counsel, respectfully represent as follows:

SUMMARY OF ARGUMENT

The general bar date in these cases was October 21, 2019 ("Original Bar Date"). The process for submission of timely claims has continued after the Original Bar Date. Pursuant to the Stipulation Between Debtors and Official Committee of Tort Claimants to Extend Bar Date for Fire Claimants and for Appointment of Claims Representative (Dkt# 4651), the Original Bar Date was extended for the benefit of Unfiled Fire Claimants to December 31, 2019 at 5:00 p.m. (Prevailing Pacific Time). The Debtors' chapter 11 plan ("Plan") was confirmed by court order on June 20, 2020, and pursuant to the Notice of Effective Date, the Plan became effective as of July 1, 2020.

This Motion concerns the amendment of claims of a family of fire victims. The entire family suffered losses as a result of the Camp Fire. Now, the Matas seek to enlarge the time (if necessary) so that their children Minor 1, Minor 2, and Minor 3, who are all minors, are appropriately included in the family claim.

Application of the so-called *Pioneer* factors shows that Movants' "late" filing is the result of excusable neglect and therefore permissible under Rule 9006(b)(1). As to the first factor, prejudice, the amended claims include the Mata's minor children, who were inadvertently not included with the original claims. The Debtors' Plan has been confirmed and the associated Fire Victim Trust funded, so the inclusion of the minor children in Mata's amended claims in the pool of fire victim claims will have no impact at all on the Debtors or the bankruptcy estates. As to the second *Pioneer* factor, the Matas' delay in filing the amended claims and any resultant impact on these proceedings are exceedingly modest and immaterial for the same reasons that Debtors will not be prejudiced. As to the third *Pioneer* factor, the reason for the delay and whether it was in

1 Movant's reasonable control, the reason for the delay was ministerial and the original claims were
 2 filed by counsel with information provided by their clients. Promptly after realizing that there
 3 were other minor children in the family, counsel filed the Amended Proof of Claims on February
 4 26, 2020. This inquiry demonstrates the Matas' good faith, satisfying the fourth *Pioneer* factor.
 5 Because consideration of the *Pioneer* factors points overwhelmingly to the Matas' neglect (if any)
 6 having been excusable, late filing of the amended proof of claims should be permitted.

7 Alternatively, the Ninth Circuit takes a liberal approach to the amendment of proofs of
 8 claim, allowing late claims to relate back to timely ones if the claims are of the same origin. Since
 9 the Amended Proofs of Claim here simply correct the omission of the minor Mata children, they
 10 have the same origin as the original claim. And since granting the requested relief would not
 11 prejudice Debtors, this Court should deem the Amended Proofs of Claim to relate back.

12 JURISDICTION AND VENUE

13 The Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334,
 14 the Order Referring Bankruptcy Cases and Proceedings to Bankruptcy Judges, General Order 24
 15 (N.D. Cal.), and Rule 5011-1(a) of the Bankruptcy Local Rules for the United States District Court
 16 for the Northern District of California. This is a core proceeding pursuant to 28 U.S.C. § 157(b).
 17 Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory
 18 predicates for the relief requested herein are Rules 7015 and 9006(b)(1) of the Federal Rules of
 19 Bankruptcy Procedure.

20 BASIS FOR RELIEF REQUESTED

21 Bankruptcy Rule 9006(b)(1) allows the enlargement of time for "an act . . . required or
 22 allowed to be done at or within a specified period . . . by order of court." Rule 9006(b)(1) further
 23 provides:

24 [T]he court for cause shown may at any time in its discretion (1) with or without
 25 motion or notice order the period enlarged if the request therefor is made before the
 26 expiration of the period originally prescribed or as extended by a previous order or
 (2) on motion made after the expiration of the specified period permit the act to be
 done where the failure to act was the result of excusable neglect.

27 Bankruptcy Rule 9006(b)(1). "Excusable neglect" under Bankruptcy Rule 9006(b)(1) is a flexible
 28 concept and case law has identified a four non-exclusive factors to be considered:

1 With regard to determining whether a party's neglect of a deadline is excusable . . .
 2 we conclude that the determination is at bottom an equitable one, taking account of
 3 all relevant circumstances surrounding the party's omission. These include . . . [1]
 4 the danger of prejudice to the [nonmovant], [2] the length of the delay and its
 5 potential impact on judicial proceedings, [3] the reason for the delay, including
 6 whether it was within the reasonable control of the movant, and [4] whether the
 7 movant acted in good faith.

8 *Pioneer Inv. Servs. Co. v. Brunswick Assocs. Ltd. Partnership*, 507 U.S. 380, 395, 113 S.Ct. 1489,
 9 1498 (1993) (citations omitted); *see also In re Orthopedic Bone Screw Prods. Liability Litig.*, 246
 10 F.3d 315, 323 (3d Cir. 2001) (citing *Pioneer*, 507 U.S. at 395). Rule 9006(b)(1) allows “late
 11 filings caused by inadvertence, mistake, or carelessness, not just those caused by intervening
 12 circumstances beyond the party's control.” *Pioneer*, 507 U.S. at 381.

13 In *Pioneer*, a creditor represented by experienced bankruptcy counsel missed the proof of
 14 claim deadline because his lawyer overlooked the filing date in the bankruptcy court’s notice. The
 15 Supreme Court affirmed the Sixth Circuit’s finding of excusable neglect and endorsed a balancing
 16 test, the hallmark of which is consideration of various factors to aid in determining whether a
 17 movant’s neglect of a bar date was excusable, thereby justifying a late proof of claim filing. This
 18 equitable determination is to “tak[e] account of all relevant circumstances surrounding the party’s
 19 omission.” *Id.* at 395, 113 S. Ct. at 1498; *see also Corning v. Corning (In re Zilog, Inc.)*, 450 F.3d
 20 996 (9th Cir. 2006) (noting *Pioneer*’s non-exhaustive list of relevant factors). Consideration of all
 21 four *Pioneer* factors—as well as a fifth engrafted onto the *Pioneer* analysis by some courts--
 22 supports the conclusion that the exclusion of all the minor children in the original claim was
 23 excusable.

24 Because in this case there is no danger of prejudice to the Debtors, the first *Pioneer* factor
 25 weighs overwhelmingly in Movants’ favor. For starters, Ninth Circuit courts regularly grant late
 26 amendments to timely proofs of claim like the ones at issue here. *See, e.g., In re Roberts Farms*
 27 *Inc.*, 980 F.2d 1248, 1251-1252 (9th Cir. 1992) (“The decision to allow an amendment to a timely
 28 filed proof of claim is within the sound discretion of the bankruptcy court;” holding that the
 bankruptcy court did not abuse its discretion in allowing late amendment of claim when
 amendment merely clarified claim without changing nature of claim or amount sought); *In re*

1 *Sambo's Restaurants, Inc.*, 754 F.2d 811, 816–17 (9th Cir. 1985) (“In the absence of prejudice to
 2 an opposing party, the bankruptcy courts, as courts of equity, should freely allow amendments to
 3 proofs of claim that relate back to the filing date of the informal claim when the purpose is to cure
 4 a defect in the claim as filed or to describe the claim with greater particularity. . . . [Claimant] is
 5 not seeking to introduce a new claim in disguise Thus, the bankruptcy court abused its
 6 discretion in disallowing the amendment in this case.”); *In re JSJF Corp.*, 344 B.R. 94, 102
 7 (B.A.P. 9th Cir. 2006), *aff'd* and remanded, 277 F. App'x 718 (9th Cir. 2008) (“[P]rejudice
 8 requires more than simply having to litigate the merits of, or to pay, a claim—there must be some
 9 legal detriment to the party opposing.”); *In re Parrott Broad. Ltd. P'ship*, 518 B.R. 602, 609
 10 (Bankr. D. Idaho 2014) (“The burden of showing prejudice is on the party objecting to the
 11 amendment.”); *In re Gordian Med., Inc.*, 499 B.R. 793, 801 (Bankr. C.D. Cal. 2013) (allowing
 12 post-deadline amendment of timely original proof of claim when all *Pioneer* factors favored
 13 movant except for movant’s delay, and suggesting that no showing of excusable neglect is even
 14 required when post-deadline amendments assert claims “of the same generic origin”); *In re*
 15 *Nucorp Energy, Inc.*, 52 B.R. 843, 846 (Bankr. S.D. Cal. 1985) (“This Court recognizes the long
 16 established liberal policy toward amendment of proofs of claim.”).

17 Other courts would agree, since the amendment was “timely” in that it came well before
 18 the Plan was confirmed and the fire victim trust funded. *See, e.g., In re O'Brien Envtl. Energy,*
 19 *Inc.*, 188 F.3d 116, 128 (3d Cir. 1999) (overruling bankruptcy court’s finding of prejudice when
 20 allowing a late claim would not require disgorgement to paid creditors and the claim could not
 21 jeopardize the debtor’s recovery since debtor was a “large, successful company with annual
 22 revenues and earnings in the millions”); *In re Best Payphones, Inc.*, 523 B.R. 54, 75-6 (Bankr.
 23 S.D.N.Y. 2015) (citing Scott I. Davidson & Jennifer A. Bender, *Late-Filed Claims are not Always*
 24 *Excluded from the Distribution Party*, AM. BANKR. INST. J. 16, 62 (Jan. 2014)) (where
 25 unsecured creditors will be made whole, “the debtor will not be able to object to a proof of claim
 26 solely on the grounds that the proof of claim was filed after the bar date”); *In re Garden Ridge*
 27 *Corp.*, 348 B.R. 642, 646 (Bankr. D. Del. 2006) (finding no prejudice in late claim when payout of
 28 the claim would be via preferred stock and would not require any disgorgement of funds already

1 paid out even if it might have affected the amount of preferred stock ultimately available to other
2 creditors).

3 Finally, any prospect of prejudice is especially unlikely here because of the form of
4 Debtors' Plan, which provided for a lump-sum payment for the benefit of fire victims. Adding or
5 subtracting claims from the totals does not affect that formulation of the Plan, or in any real way
6 affect the estate. While the Trust has recently been funded, distributions from the Trust have not
7 been made, as the Trustee and his professionals and team are in the process of formulating claims
8 resolution calculations and procedures. This motion is filed in an abundance of caution to ensure
9 the minor children are all explicitly provided for in the family's proofs of claim. The amended
10 claims were filed before the plan was confirmed and the trust funded, so the Mata's have every
11 reason to believe the amended claims are included in the Trustee's claims database, and are simply
12 requesting a formal order to ensure that is the case

13 Consideration of the second *Pioneer* factor, the length of the delay and its potential impact
14 on these proceedings, also strongly favors the Matas. Here, although the claims bar date has
15 passed, there is no substantive impact on these proceedings and the administration of this case.
16 See *In re Lyondell Chemical Co.*, 543 B.R. 400, 410 (Bankr. S.D.N.Y. 2016) (length of delay is
17 only given meaning by its effect on the administration of the case). The amendments if permitted
18 by the Court, would have little to no appreciable impact on these proceedings. Moreover, the
19 amended filing occurred well before Plan confirmation and when the Plan became effective.

20 As to the third *Pioneer* factor, the reason for the delay and whether it was in Movants'
21 reasonable control, again leans in favor of excusability. Movants acknowledges this Court's
22 observation, in 2004, that "[o]n balance, ... the authorities construing *Pioneer* weigh the reasons
23 for the delay factor most heavily." *In re Pacific Gas & Electric, Co.*, 311 B.R. 84, 91 (Bankr. N.D.
24 Cal. 2004) (citing *Graphic Communications Int'l Union, Local 12-N v. Quebecor Printing*
25 *Providence, Inc.*, 270 F.3d 1 (1st Cir. 2001)).¹ A "satisfactory explanation for the late filing" is

26
27 ¹ That said, the Fifth and Eleventh Circuits and courts in at least two other circuits (the Third and
28 the Eighth) have identified the danger of prejudice is the most important of the *Pioneer* factors.
See *Greyhound Lines, Inc. v. Rogers (In re Eagle Bus Mfg., Inc.)*, 62 F.3d 730, 737 (5th Cir. 1995)

1 required. *Graphic Communications at 5.*

2 The reason for the delay was simply a lack of communicated information between the
3 Matas and their counsel. As soon as their counsel became fully informed, he filed the Amended
4 Proofs of Claim. Finally, as to the fourth *Pioneer* factor, no reasonable suggestion can be made
5 that Movants failed to act in good faith.

6 It is also critical to note that an order granting this Motion is of course without prejudice to
7 the rights of relevant parties (the Trustee of the Fire Victim Trust for example) to object to the
8 Matas' claims on substantive or legal grounds, other than timeliness.

9 Alternatively, the court has authority under Fed. R. Bank. P. 7015 to enter an order
10 providing that the amended claims relate back to the originally-filed claims. Rule 7015 of the
11 Federal Rules of Bankruptcy Procedure incorporates Federal Rules of Civil Procedure 15. Rule
12 15(c) applies to amendments of claims that relate back to the time of original filing. Rule 7015
13 applies to the amendment of proofs of claims. *See, e.g., In re Roberts Farms Inc.*, 980 F.2d 1248,
14 1251 (9th Cir. 1992) (citing Rule 7015 in support of a "liberal policy that permits amendments to a
15 proof of claim"); *In re Pac. Gas & Elec. Co.*, 311 B.R. 84, 89 (Bankr. N.D. Cal. 2004) ("[T]he
16 court concludes that the Amended [Proofs of] Claim[] do not sufficiently relate to the Original[s] .
17 . . for purposes of F.R.C.P. 15(c)."); *In re Edwards Theatres Circuit, Inc.*, 281 B.R. 675, 681
18 (Bankr. C.D. Cal. 2002); *In re Circle K Corp.*, 165 B.R. 649, 652 (Bankr. D. Ariz. 1994) ("A
19 claim filed after the bar date qualifies as an amendment to a timely claim, if both are of the same
20 generic origin.") Absent evidence of prejudice from substitution, this Court should allow
21 amendment in the interests of justice. The minor Mata children should be represented in Movants'
22 proofs of claim as reflected in the Amended Proofs of Claim.

23
24 ("Under *Pioneer*, the central inquiry is whether the debtor will be prejudiced."); *Advanced*
25 *Estimating System, Inc. v. Riney*, 77 F.3d 1322, 1325 (11th Cir. 1996) ("Primary importance
26 should be accorded to the absence of prejudice to the nonmoving party and to the interest of
27 efficient judicial administration."); *In re Cable & Wireless USA, Inc.*, 338 B.R. 609, 614 (Bankr. D.
28 Del. 2006) (quoting *In re Tannen Towers Acquisition Corp.*, 235 B.R. 748, 755 (D.N.J. 1999) ("In
applying the *Pioneer* test, courts place the greatest weight on whether any prejudice to the other
parties will occur by allowing a late claim."); *Matter of Papp Intern., Inc.*, 189 B.R. 939, 944
(Bankr. D. Neb. 1995) (citing *In re Sacred Heart Hos. of Norristown*, 186 B.R. 891 as suggesting
"the most significant [*Pioneer*] factor ... is that of prejudice to the debtor.").

CONCLUSION

For the reasons set forth above, Movants respectfully requests that this Court enter an order pursuant to either Bankruptcy Rule 7015 and/or 9006(b)(1) as follows:

1. Granting this Motion;
2. Directing that the Proofs of Claim attached as Exhibits 3 and 4 hereto be deemed timely filed;
3. Granting such other or further relief as the Court deems just and proper.

DATED: July 14, 2020

DOWNEY BRAND LLP

By: /s/ Jamie P. Dreher
JAMIE P. DREHER
Attorneys for Jose and Karen Mata

EXHIBIT 1

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA (SAN FRANCISCO DIVISION)

In re:
PG&E CORPORATION,
- and -
PACIFIC GAS AND ELECTRIC
COMPANY,
Debtors.

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

Proof of Claim (Fire Claim Related)

Read the instructions before filing this claim form. This form is for tort claimants who have a claim against the Debtors (i.e. PG&E Corporation and Pacific Gas and Electric Company) that arose prior to the Debtors filing for bankruptcy (i.e. prior to January 29, 2019) and that arose from, or relates to, a fire.

Do not use this form for non-fire claims. Non-fire tort claimants should use Form 410.

Do NOT file a fraudulent claim. A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Please type or print in the spaces below. Do NOT use red ink or pencil.

Part 1: Identify the Claim

1. Who is the current creditor?		<u>Jose Mata</u> Name of the current creditor (the person or entity to be paid for this claim)
2. Has this claim been acquired from someone else?		<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____
3. Are you filing this claim on behalf of your family? A family is a group of two or more people related by birth, marriage, domestic partnership, or adoption and residing together. All such people are considered as members of one family.		<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If you checked "Yes", please provide the full name of each family member that you are filing on behalf of: _____ _____ _____ _____
4. Where should notices and payments to the creditor be sent? Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)
	Name <u>Reiner Slaughter & Frankel</u> Attorney Name (if applicable) <u>Russell Reiner</u> Attorney Bar Number (if applicable) <u>84461</u> Street Address <u>2851 Park Marina Dr, Suite 200</u> City <u>Redding</u> State <u>CA</u> Zip Code <u>96001</u> Phone Number <u>530-241-1905</u> Email Address <u>rreiner@reinerslaughter.com</u>	Name <u>Eric Ratinooff Law Corp Client Trust Account</u> Attorney Name (if applicable) <u>Eric J. Ratinooff</u> Attorney Bar Number (if applicable) <u>166204</u> Street Address <u>401 Watt Avenue</u> City <u>Sacramento</u> State <u>CA</u> Zip Code <u>95864</u> Phone Number <u>916-970-9100</u> Email Address <u>nziegler@ericratinooff.com</u>
5. Does this claim amend one already filed?		<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY
6. Do you know if anyone else has filed a proof of claim for this claim?		<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____

Part 2:**Give Information About the Claim as of the Date this Claim Form is Filed**

7. What fire is the basis of your claim?

Check all that apply.

☒ Camp Fire (2018)

☐ North Bay Fires (2017)

☐ Ghost Ship Fire (2016)

☐ Butte Fire (2015)

☐ Other (please provide date and brief description of fire: _____)

8. What are the loss location(s) where you and/or your family suffered harm? (e.g. home or business address, place of injury, place from which you were evacuated, if different.)

Location(s) **1867 Honeyrun Rd, Chico CA 95928**

9. How were you and/or your family harmed?

Check all that apply

☒ Property Damage (homes, structures, personal property, land, trees, landscaping, and all other property damage)

☒ Owner ☐ Renter ☒ Occupant ☐ Other (Please specify): _____

☒ Personal Injury

☐ Wrongful Death (if checked, please provide the name of the deceased)

☐ Business Loss/Interruption

☒ Lost wages and earning capacity

☒ Loss of community and essential services

☐ Agricultural loss

☐ Other (Please specify): _____

10. What damages are you and/or your family claiming/seeking?

Check all that apply

☒ Economic damages (including replacement cost of damaged property, diminution in value, loss of use, lost inventory, lost profits, and other economic damage)

☒ Non-economic damages (including loss of society and support, loss of consortium, pain and suffering, emotional distress, annoyance and discomfort, and other non-economic damage)

☒ Punitive, exemplary, and statutory damages

☒ Attorney's fees and litigation costs

☒ Interest

☒ Any and all other damages recoverable under California law

☐ Other (Please specify): _____

11. How much is the claim?

☐ \$_____ (optional)

☒ Unknown / To be determined at a later date

Part 3: Sign Below

The person completing this proof of claim must sign and date it.
FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both.
18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

- ☐ I am the creditor.
☒ I am the creditor's attorney or authorized agent.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 10/08/2019 (mm/dd/yyyy)

/s/Russell Reiner, Esq.

Signature

Print the name of the person who is completing and signing this claim:

Name	Russell	Reiner
	First name	Middle name Last name
Title	Lawyer	
Company	Reiner Slaughter & Frankel	
	Identify the corporate servicer as the company if the authorized agent is a servicer.	
Address	2851 Park Marina Dr, Suite 200	
	Number	Street
	Redding	CA 96001
	City	State ZIP Code
Contact phone	530-241-1905	Email rreiner@reinerslaughter.com

EXHIBIT 2

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA (SAN FRANCISCO DIVISION)

In re:
PG&E CORPORATION,
- and -
PACIFIC GAS AND ELECTRIC
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Proof of Claim (Fire Claim Related)

Read the instructions before filing this claim form. This form is for tort claimants who have a claim against the Debtors (i.e. PG&E Corporation and Pacific Gas and Electric Company) that arose prior to the Debtors filing for bankruptcy (i.e. prior to January 29, 2019) and that arose from, or relates to, a fire.

Do not use this form for non-fire claims. Non-fire tort claimants should use Form 410.

Do NOT file a fraudulent claim. A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Please type or print in the spaces below. Do NOT use red ink or pencil.

Part 1: Identify the Claim

1. Who is the current creditor?	Karen Mata Name of the current creditor (the person or entity to be paid for this claim)	
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____	
3. Are you filing this claim on behalf of your family? A family is a group of two or more people related by birth, marriage, domestic partnership, or adoption and residing together. All such people are considered as members of one family.	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If you checked "Yes", please provide the full name of each family member that you are filing on behalf of: _____ _____ _____ _____	
4. Where should notices and payments to the creditor be sent? Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Where should notices to the creditor be sent? Name Reiner Slaughter & Frankel Attorney Name (if applicable) Russell Reiner Attorney Bar Number (if applicable) 84461 Street Address 2851 Park Marina Dr, Suite 200 City Redding State CA Zip Code 96001 Phone Number 530-241-1905 Email Address rreiner@reinerslaughter.com	Where should payments to the creditor be sent? (if different) Name Eric Ratinoff Law Corp Client Trust Account Attorney Name (if applicable) Eric J. Ratinoff Attorney Bar Number (if applicable) 166204 Street Address 401 Watt Avenue City Sacramento State CA Zip Code 95864 Phone Number 916-970-9100 Email Address nziegler@ericratinoff.com
5. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on ____ / ____ / ____	
6. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____	

Proof of Claim (Fire Related)

Page 1

Part 2:**Give Information About the Claim as of the Date this Claim Form is Filed****7. What fire is the basis of your claim?**

Check all that apply.

☒ Camp Fire (2018)☐ North Bay Fires (2017)☐ Ghost Ship Fire (2016)☐ Butte Fire (2015)☐ Other (please provide date and brief description of fire: _____)**8. What are the loss location(s) where you and/or your family suffered harm? (e.g. home or business address, place of injury, place from which you were evacuated, if different?)**Location(s) **1867 Honeyrun Rd, Chico CA 95928****9. How were you and/or your family harmed?**

Check all that apply

☒ Property Damage (homes, structures, personal property, land, trees, landscaping, and all other property damage)☒ Owner ☐ Renter ☒ Occupant ☐ Other (Please specify): _____☒ Personal Injury☐ Wrongful Death (if checked, please provide the name of the deceased)☒ Business Loss/Interruption☒ Lost wages and earning capacity☒ Loss of community and essential services☐ Agricultural loss☐ Other (Please specify): _____**10. What damages are you and/or your family claiming/seeking?**

Check all that apply

☒ Economic damages (including replacement cost of damaged property, diminution in value, loss of use, lost inventory, lost profits, and other economic damage)☒ Non-economic damages (including loss of society and support, loss of consortium, pain and suffering, emotional distress, annoyance and discomfort, and other non-economic damage)☒ Punitive, exemplary, and statutory damages☒ Attorney's fees and litigation costs☒ Interest☒ Any and all other damages recoverable under California law☐ Other (Please specify): _____**11. How much is the claim?**☐ \$ _____ (optional)☒ Unknown / To be determined at a later date

Part 3: Sign Below

The person completing this proof of claim must sign and date it.
FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both.
18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

- ☐ I am the creditor.
☒ I am the creditor's attorney or authorized agent.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 10/08/2019 (mm/dd/yyyy)

/s/Russell Reiner, Esq.

Signature

Print the name of the person who is completing and signing this claim:

Name	Russell	Reiner	
	First name	Middle name	Last name
Title	Lawyer		
Company	Reiner Slaughter & Frankel		
	Identify the corporate servicer as the company if the authorized agent is a servicer.		
Address	2851 Park Marina Dr, Suite 200		
	Number	Street	
	Redding	CA	96001
	City	State	ZIP Code
Contact phone	530-241-1905	Email	rreiner@reinerslaughter.com

EXHIBIT 3

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA (SAN FRANCISCO DIVISION)

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No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

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PRIME CLERK LLC

Proof of Claim (Fire Claim Related)

Read the instructions before filing this claim form. This form is for tort claimants who have a claim against the Debtors (i.e. PG&E Corporation and Pacific Gas and Electric Company) that arose prior to the Debtors filing for bankruptcy (i.e. prior to January 29, 2019) and that arose from, or relates to, a fire.

Do not use this form for non-fire claims. Non-fire tort claimants should use Form 410.

Do NOT file a fraudulent claim. A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Please type or print in the spaces below. Do NOT use red ink or pencil.

Part 1: Identify the Claim

1. Who is the current creditor?	Karen Mata Name of the current creditor (the person or entity to be paid for this claim)	<input checked="" type="checkbox"/> Date Stamped Copy Returned <input type="checkbox"/> No Self-Addressed Stamped Envelope <input type="checkbox"/> No Copy Provided
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____	
3. Are you filing this claim on behalf of your family? A family is a group of two or more people related by birth, marriage, domestic partnership, or adoption and residing together. All such people are considered as members of one family.	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes If you checked "Yes", please provide the full name of each family member that you are filing on behalf of: Jose Mata Gracie Mata (minor) Jack Mata (minor) Mollie Mata (minor)	Israel Mata Leticia Mata
4. Where should notices and payments to the creditor be sent? Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Where should notices to the creditor be sent? Name: Reiner, Slaughter & Frankel Attorney Name (if applicable): Russell Reiner Attorney Bar Number (if applicable): 84461 Street Address: 2851 Park Marina Dr, Suite 200 City: Redding State: CA Zip Code: 96001 Phone Number: 530-241-1905 Email Address: reiner@reinerslaughter.com	Where should payments to the creditor be sent? (if different) Name: Eric Ratinoff Law Corp Client Trust Account Attorney Name (if applicable): Eric J. Ratinoff Attorney Bar Number (if applicable): 166204 Street Address: 401 Watt Avenue City: Sacramento State: CA Zip Code: 95864 Phone Number: 916-970-9100 Email Address: nziegler@ericratinoff.com
5. Does this claim amend one already filed?	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes. Claim number on court claims registry (if known) 32214	Filed on 10/17/2019 MM / DD / YYYY
6. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____	

Proof of Claim (Fire Related)



Page 1

Claim Number: 97055

Case: 19-30088 Doc# 8378 Filed: 07/14/20 Entered: 07/14/20 13:36:40 Page 18 of 28

Part 2:**Give Information About the Claim as of the Date this Claim Form is Filed****7. What fire is the basis of your claim?**

Check all that apply.

- ☒ Camp Fire (2018)
☐ North Bay Fires (2017)
☐ Ghost Ship Fire (2016)
☐ Butte Fire (2015)
☐ Other (please provide date and brief description of fire: _____)

8. What are the loss location(s) where you and/or your family suffered harm? (e.g. home or business address, place of injury, place from which you were evacuated, if different.)

Location(s): 1867 Honeyrun Rd, Chico CA 95928

9. How were you and/or your family harmed?

Check all that apply

- ☒ Property Damage (homes, structures, personal property, land, trees, landscaping, and all other property damage)
☒ Owner ☐ Renter ☒ Occupant ☐ Other (Please specify): _____
☒ Personal Injury
☐ Wrongful Death (if checked, please provide the name of the deceased) _____
☐ Business Loss/Interruption
☒ Lost wages and earning capacity
☒ Loss of community and essential services
☐ Agricultural loss
☐ Other (Please specify): _____

10. What damages are you and/or your family claiming/seeking?

Check all that apply

- ☒ Economic damages (including replacement cost of damaged property, diminution in value, loss of use, lost inventory, lost profits, and other economic damage)
☒ Non-economic damages (including loss of society and support, loss of consortium, pain and suffering, emotional distress, annoyance and discomfort, and other non-economic damage)
☒ Punitive, exemplary, and statutory damages
☒ Attorney's fees and litigation costs
☒ Interest
☒ Any and all other damages recoverable under California law
☐ Other (Please specify): _____

11. How much is the claim?

- ☐ \$ _____ (optional)
☒ Unknown / To be determined at a later date

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

- ☐ I am the creditor.
☒ I am the creditor's attorney or authorized agent.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 02/24/2020 (mm/dd/yyyy)

/s/Russell Reiner, Esq.

Signature

Print the name of the person who is completing and signing this claim:

Name	<u>Russell</u>	<u>Reiner</u>
	First name	Middle name Last name
Title	<u>Lawyer</u>	
Company	<u>Reiner, Slaughter & Frankel</u>	
	Identify the corporate servicer as the company if the authorized agent is a servicer.	
Address	<u>2851 Park Marina Dr, Suite 200</u>	
	Number	Street
	<u>Redding</u>	<u>CA</u> <u>96001</u>
	City	State ZIP Code
Contact phone	<u>530-241-1905</u>	Email <u>rreiner@reinerslaughter.com</u>

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PROOF OF SERVICE

I am citizen of the United States and employed in Shasta County, California; I am over the age of eighteen and not a party to the within action; my business address is 2851 Park Marina Drive, Suite 200, Redding, CA 96001; and, on this date, I served:

PROOF OF CLAIM

_____ By transmitting a true copy thereof by facsimile machine to the telefacsimile number shown following the name of each such party.

_____ By hand-delivery to the person(s) set forth below.

 X By FedEx 2-day delivery to the person/address set forth below.

_____ By United States Post Office Express Mail overnight delivery to the person/address set forth below.

_____ By United Postal Service (UPS) overnight delivery to the person/address set forth below.

_____ By United States Post Office regular delivery to the person/address set forth below.

***PG&E Corporation Claims Processing Center
C/O Prime Clerk LLC
850 3rd Ave, Suite 412
Brooklyn, NY 11232***

I declare under penalty of perjury that the foregoing is true and correct.
Executed at Redding, California, on February 24, 2020.



JODI PALMER

ORIGIN ID: RDDA (530) 241-1905
 RUSSELL REINER
 REINER SLAUGHTER & FRANKEL
 2851 PARK MARINA DRIVE
 SUITE 200
 REDDING, CA 96001
 UNITED STATES US

SHIP DATE: 24FEB20
 ACTWGT: 0.10 LB
 CAD: 104349789/NET4220

BILL SENDER

TO CO PRIME CLERK LLC
 PG&E CORPORATION CLAIMS PROCESSING
 850 3RD AVE, SUITE 412

FEB 26 2020

BROOKLYN NY 11232

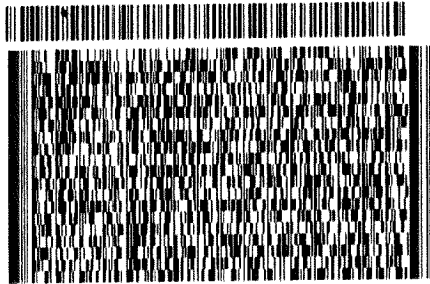
(844) 339-4217

REF CAMPUS REINER SLAUGHTER & FRANKEL

PRIME CLERK LLC

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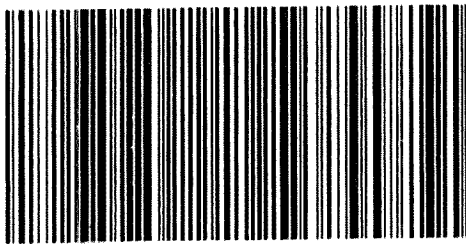
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Warning: Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional billing charges, along with the cancellation of your FedEx account number. Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on fedex.com. FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$1,000, e.g. jewelry, precious metals, negotiable instruments and other items listed in our ServiceGuide. Written claims must be filed within strict time limits, see current FedEx Service Guide.

56B12049E/FE4A

EXHIBIT 4

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA (SAN FRANCISCO DIVISION)

In re:
PG&E CORPORATION,
- and -
PACIFIC GAS AND ELECTRIC
COMPANY,
Debtors.

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

RECEIVED
FEB 26 2020

PRIME CLERK LLC

Proof of Claim (Fire Claim Related)

Read the instructions before filing this claim form. This form is for tort claimants who have a claim against the Debtors (i.e. PG&E Corporation and Pacific Gas and Electric Company) that arose prior to the Debtors filing for bankruptcy (i.e. prior to January 29, 2019) and that arose from, or relates to, a fire.

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Please type or print in the spaces below. Do NOT use red ink or pencil.

Part 1: Identify the Claim

1. Who is the current creditor?	Jose Mata Name of the current creditor (the person or entity to be paid for this claim)	<input checked="" type="checkbox"/> Date Stamped Copy Returned <input type="checkbox"/> No Self-Addressed Stamped Envelope <input type="checkbox"/> No Copy Provided
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____	
3. Are you filing this claim on behalf of your family? A family is a group of two or more people related by birth, marriage, domestic partnership, or adoption and residing together. All such people are considered as members of one family.	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes If you checked "Yes", please provide the full name of each family member that you are filing on behalf of: Karen Mata Gracie Mata (minor) Jack Mata (minor) Mollie Mata (minor)	Israel Mata Leticia Mata _____ _____
4. Where should notices and payments to the creditor be sent? Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Where should notices to the creditor be sent? Name: Reiner, Slaughter & Frankel Attorney Name (if applicable): Russell Reiner Attorney Bar Number (if applicable): 84461 Street Address: 2851 Park Marina Dr, Suite 200 City: Redding State: CA Zip Code: 96001 Phone Number: 530-241-1905 Email Address: rreiner@reinerslaughter.com	Where should payments to the creditor be sent? (if different) Name: Eric Ratinoff Law Corp Client Trust Account Attorney Name (if applicable): Eric J. Ratinoff Attorney Bar Number (if applicable): 166204 Street Address: 401 Watt Avenue City: Sacramento State: CA Zip Code: 95864 Phone Number: 916-970-9100 Email Address: nziegler@ericratinoff.com
5. Does this claim amend one already filed?	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes. Claim number on court claims registry (if known): 32215	Filed on: 10/17/2019 MM / DD / YYYY
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Proof of Claim (Fire Related)



Page 1

Claim Number: 97052

Case: 19-30088 Doc# 8378 Filed: 07/14/20 Entered: 07/14/20 11:36:40 Page 24 of 28

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Check all that apply.

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☐ North Bay Fires (2017)
☐ Ghost Ship Fire (2016)
☐ Butte Fire (2015)
☐ Other (please provide date and brief description of fire: _____)

8. What are the loss location(s) where you and/or your family suffered harm? (e.g. home or business address, place of injury, place from which you were evacuated, if different.)

Location(s): 1867 Honeyrun Rd, Chico CA 95928

9. How were you and/or your family harmed?

Check all that apply

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Executed on date 02/24/2020 (mm/dd/yyyy)

/s/Russell Reiner, Esq.

Signature

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	First name	Middle name	Last name
Title	Lawyer		
Company	Reiner, Slaughter & Frankel		
	Identify the corporate servicer as the company if the authorized agent is a servicer.		
Address	2851 Park Marina Dr, Suite 200		
	Number	Street	
	Redding	CA	96001
	City	State	ZIP Code
Contact phone	530-241-1905	Email	rreiner@reinerslaughter.com

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Brooklyn, NY 11232***

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Executed at Redding, California, on February 24, 2020.



JODI PALMER

ORIGIN ID: RDDA (530) 241-1905
 RUSSELL REINER
 REINER SLAUGHTER & FRANKEL
 2851 PARK MARINA DRIVE
 SUITE 200
 REDDING, CA 96001
 UNITED STATES US

SHIP DATE: 24FEB20
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BILL SENDER

TO CO PRIME CLERK LLC

PG&E CORPORATION CLAIMS PROCESSING
 850 3RD AVE, SUITE 412

FEB 26 2020

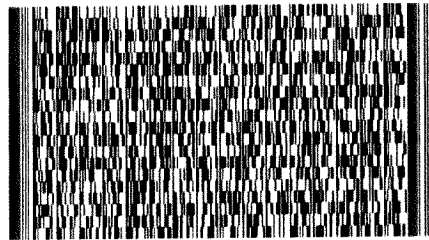
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(844) 338-4217

REF CAMPT PRIME CLERK LLC

IN
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DEPT:



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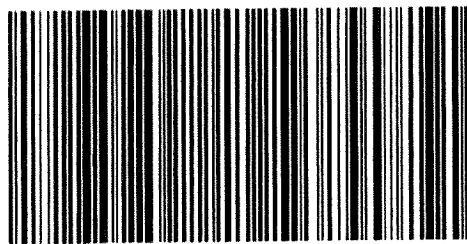
** 2DAY **

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